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Surrogate Court Judge
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Supreme Court Justice
2005-2013

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1919 - 2015

December 12, 2022

VIA CM/ECF

Hon. Brenda K. Sannes
United States District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse, NY 13261-7336

RE: *USA v. Jared Marc Brown*
1:19-cr-00095-BKS

Dear Judge Sannes:

I represent Mr. Brown who is currently scheduled for sentencing on December 22, 2022, at 9:30 a.m.

At this time, Mr. Brown is housed in the Northeast Ohio Correctional Center which is approximately a five (5) hour drive from the Rochester courthouse. I visited Mr. Brown on December 7, 2022, and we were unable to have a contact visit due to his COVID concerns. Additionally, based upon his recent medical issues at NEOCC and the stress that could arise from a ten (10) hour round trip drive, we respectfully request that Mr. Brown's appearance for sentencing be virtual. Mr. Brown did confirm this request during my visit.

As a matter of procedure, the only objection in the Pre-Sentence Report of July 21, 2022 is with respect to the lack of Adjustment for Acceptance of Responsibility. I respectfully request that Mr. Brown's Sentence Statement and accompanying legal Memorandum of Law be due on December 15, 2022.

Respectfully yours,
GALLO & IACOVANGELO, LLP

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/JSW